

Mecosta-Osceola Intermediate School District

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Federal Communications Commission
445 12th Street SW
Washington, DC 20554

September 13, 2013

Dear Sir/Madame,

I am writing today in response to the FCC's Notice of Proposed Rulemaking which, among other things, proposes changes to the E-Rate program. Before delving into my response to the proposed changes, I want to first thank the FCC for your continued support for the E-Rate program. The E-Rate program provides critical discounts to assist schools (like mine) to obtain affordable telecommunications and internet access.

I had the privilege of meeting two of the Commissioners this past summer while in Washington and found them to be very personable and willing to listen. We live in a rural setting where E-Rate is the lifeline to communication for our six school districts. The MOISD is the feeder and support system for our local schools. We use the E-rate system to bring about greater connectivity for our very rural and poverty stricken area; most of our districts are over the fifty percent mark for free-and-reduced funding.

The E-Rate program is a program succeeding in its mission. As the FCC moves forward with this NPRM, it is prudent to remain focused on the fact that E-Rate is a program that works and that any changes to the E-Rate program should be focused on expanding a successful program that has yet to reach its full potential. The current program, while needing some marginal updates to its structure, is most strained by increasing demand for E-Rate-supported services and persistently low funding. The single most effective step the FCC can take to bolster E-Rates current and future success is to provide \$5 billion in funding, an amount commensurate with current demand.

There are additional programmatic changes and restructuring that can provide additional efficiencies and savings. To rely solely on programmatic efficiencies, however, without providing additional new funding is a shortsighted solution, a policy that fails to address the program's most significant problem: inadequate funding.

I think this NPRM is an opportunity to tackle the important work of expanding a successful program. E-Rate is not a broken program that needs to be fixed; it is a successful program that schools and libraries continue to rely on, a program that must continue to provide funding critical for telecommunications and connectivity.

The number one problem we have with E-rate is the amount of paperwork and redundancy that exists in the program. Every year you have to "start over" when developing a strategy and plan – the paperwork monster strikes again! It would be great to allow for three to five year plans and be able to do all of this with a click of a few boxes and sign a few things. Right now, my small districts don't have the personnel to chase down all of the requirements, so we waste dollars on "experts" to do these tasks for us. Those dollars could be used to go to the classroom. We love E-rate, but the paperwork for the smaller, rural systems is a very large pain! Anything you could do to assist in this would be appreciated.

Thank you for considering my response as you moves forward with your decision on the E-Rate program. I applaud the FCC for its continued efforts to protect the already oversubscribed E-Rate program by ensuring the future of this successful program. I urge you to support significant increased funding for the E-Rate program, and to ensure that the program and its limited resources are protected and preserved.

Sincerely,

A handwritten signature in black ink, appearing to read "Curtis Finch".

Curtis Finch, Ph.D., Superintendent